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Attorneys for Debtor
Southern Inyo Healthcare District

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO DIVISION

In re

SOUTHERN INYO HEALTHCARE
DISTRICT,

Debtor.

Case No. 1:16-bk-10015-FEC

Chapter 9

WGG-5

**THIRD JOINT STIPULATION REGARDING
THE CONTINUED HEARING ON SECOND
AMENDED DEBTOR'S MOTION FOR
ORDER ESTIMATING CONTINGENT OR
UNLIQUIDATED CLAIMS UNDER 11
U.S.C. SECTION 502(c)**

Current Hearing Date:

Date: April 14, 2020

Time: 9:00 a.m.

Place: 501 I. Street
Sacramento, CA
Courtroom 28

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1 TO THE HONORABLE FREDRICK E. CLEMENT, UNITED STATES BANKRUPTCY
2 JUDGE, AND ALL OTHER INTERESTED PARTIES:

3 Southern Inyo Healthcare District ("District"), Healthcare Conglomerate Associates,
4 LLC ("HCCA"), and Vi Healthcare Finance, Inc. ("Vi," collectively with the District and
5 HCCA, the "Parties"), submit this Third Joint Status Report Regarding the Continued
6 Hearing on the Second Amended Debtor's Motion for Order Estimating Contingent or
7 Unliquidated Claims Under 11 U.S.C. Section 502(c) ("Status Report").

8 The District filed a chapter 9 bankruptcy petition in this district, commencing case
9 number 1:16-bk-10015-FEC, on January 4, 2016. An Order for Relief Under Chapter 9
10 was issued by the Court on July 12, 2016.

11 On October 22, 2019, the District filed its Second Amended Debtor's Motion for
12 Order Estimating Contingent or Unliquidated Claims Under 11 U.S.C. Section 502(c)
13 ("Motion"). On October 30, 2019, HCCA and Vi filed an application to continue the
14 hearing on the Motion ("Application to Continue"). The Application to Continue was
15 approved by order entered on October 31, 2019, and the hearing on the Motion was
16 continued to December 17, 2019 at 9:00 a.m.

17 Based upon the fact that the Parties had reached a settlement of their disputes,
18 including the Motion, and were documenting that settlement, on November 20, 2019, the
19 Parties filed a Stipulation to Continue the Hearing on the Motion ("Stipulation"), which was
20 granted by order entered on November 21, 2019. The hearing on the Motion was
21 continued to January 7, 2020. The Court then continued the hearing on the Motion to
22 January 28, 2020 at 9:00 a.m.

23 At the hearing on January 28, 2020, the Parties had not finalized and documented
24 their agreement. As a result, the Court continued the hearing on the Motion to February
25 25, 2020, at 9:00 a.m. and ordered the Parties to file a joint status report if the Motion had
26 not been withdrawn.

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1 On February 11, 2020, the Parties filed a joint status report requesting the Court
2 continue the Motion for another thirty days while the Parties finalize the documentation of
3 the agreement. At the hearing on February 25, 2020, the Court continued the hearing on
4 the Motion to April 14, 2020.

5 The Parties are still working on finalizing the documentation of the settlement
6 agreement. The Parties believe that another short continuance is necessary to finalize the
7 settlement agreement between the Parties.

8 Therefore, the Parties request that the hearing on the Motion be continued for thirty
9 (30) days, which will allow the Parties to complete and execute a settlement agreement.


10 Dated: March 31, 2020

WEILAND GOLDEN GOODRICH LLP

11 By: /s/ Jeffrey I. Golden
12 JEFFREY I. GOLDEN
13 BETH E. GASCHEN
14 RYAN W. BEALL
15 Attorneys for Debtor
16 Southern Inyo Healthcare District

17 Dated: March 31, 2020

WANGER JONES HELSEY PC

18 By: 
19 OLIVER W. WANGER
20 Attorneys for Healthcare
21 Conglomerate Associates, LLC and
22 Vi Healthcare Finance
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